

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

Case No. 1:20-cv-00683,

Fields v. Princeton Pharmaceutical Inc., et. al.

NOTICE OF VIDEOTAPED DEPOSITION OF PLAINTIFF TIVIS FIELDS

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Solco Healthcare U.S., LLC, and Princeton Pharmaceutical Inc. will take the deposition upon oral examination of Tivis Fields, on **May 12, 2021 at 9:00 a.m. EDT**, and continuing until completion, via remote deposition while the witness is at his home or office or other location agreed to by the parties.

Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Nathan Bart Reeder

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30 South 17th Street
Philadelphia, PA 19103-4196
(215) 979-1985
nbreeder@duanemorris.com

Date: April 12, 2021

Respectfully submitted,

s/ Nathan B. Reeder

Nathan B. Reeder (Pa. Bar No. 324954)

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*Attorney for Defendants Princeton
Pharmaceutical Inc., Zhejiang Huahai
Pharmaceutical Co., Ltd., Solco
Healthcare U.S., LLC, and Huahai U.S., Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on April 12, 2021, a true and correct copy of the foregoing Notice of Videotaped Deposition of Plaintiff Tivis Fields was served upon all counsel of record via CM/ECF. I further certify that a copy of the foregoing was served on the following counsel by email on April 12, 2021:

Sejal Brahmbhatt (counsel for Plaintiff Fields)

Adam Slater, Esq. (via email)

Daniel A. Nigh, Esq. (via email)

Ruben Honik, Esq. (via email)

David Stanoch, Esq. (via email)

Conlee Whiteley, Esq. (via email)

Seth A. Goldberg, Esq. (via email)

Jessica Priselac, Esq. (via email)

Clem C. Trischler, Esq. (via email)

Sarah E. Johnston, Esq. (via email)

s/ Nathan B. Reeder

Nathan B. Reeder